

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MISS UNIVERSE L.P., LLLP,	:	12-cv-09174 (JPO)
	:	Petitioner,
-against-	:	DECLARATION OF MICHAEL COHEN IN FURTHER SUPPORT OF PETITIONER'S PETITION TO CONFIRM ARBITRATION AWARD AND IN OPPOSITION TO RESPONDENT'S CROSS-MOTION TO VACATE THE ARBITRATION AWARD
SHEENA MONNIN,	:	
	:	Respondent.
	:	

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MICHAEL COHEN, an attorney duly admitted to practice in the courts of the State of New York and before the above-named Court, respectfully affirms the following under penalty of perjury:

1. I am a member of the Bar of this Court, and am Executive Vice President of the Trump Organization and Special Counsel to Donald J. Trump.
2. On November 2, 2012, I participated in a phone call with Scott Balber ("Balber"), the attorney representing the Miss Universe Organization (the "MUO") in its arbitration against Sheena Monnin ("Monnin") (the "Arbitration"), and Monnin's attorney, Richard Klineburger ("Klineburger").
3. During the call, Klineburger threatened Balber and me that if the MUO did not withdraw its pending arbitration, he would file a complaint against the MUO and Donald J. Trump, one of the owners of the MUO, in the Western District of Pennsylvania.
4. Balber and I told Klineburger that we did not intend to withdraw the arbitration, and it was clear that we intended to proceed with the Hearing the following Monday.

5. Klineburger also made clear that his client, Monnin, was aware that the Arbitration was going to proceed with a hearing on November 5, 2012 (the "Hearing"). When asked whether he or Monnin intended to appear at the Hearing, Klineburger stated that "we" were still considering their options and deciding whether to participate in the Hearing.

Dated: February 20, 2013
New York, New York

Michael Cohen